

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ELISEO ESCAMILLA,

Plaintiff,

V.

**EMERALD CONCRETE, INC.,
MARTIN KEANE, Individually, and
JERRY KEANE, Individually,**

Defendants.

)
)
)
)
)
)
)
)
)
)

No. 08 CV 2608

Judge John W. Darrah

Magistrate Judge Schenkier

**AGREED MOTION TO EXTEND TIME TO ANSWER
OR OTHERWISE PLEAD**

Defendants, Emerald Concrete, Inc., Martin Keane, Individually, and Jerry Keane, Individually, by their attorneys, Klein Dub & Holleb, Ltd., herein move this Court for an order extending the time for Defendants to answer or otherwise respond to the Complaint from June 22, 2008 to July 21, 2008. The parties are seriously discussing settlement and have a high probability of settling the case without further litigation.

Counsel for Defendants has conferred by telephone with counsel for Plaintiff, Marty Denis on June 18, 2008, regarding this Motion and both parties concur in the relief requested.

WHEREFORE, Defendants request that their motion be granted and that the Court enter an order extending the time for Defendants to answer or otherwise respond to the Complaint to July 21, 2008.

Dated: June 20, 2008

Respectfully submitted,

EMERALD CONCRETE, INC., MARTIN
KEANE, Individually, and JERRY KEANE,
Individually

By: s/Davi L. Hirsch
DAVI L. HIRSCH (ARDC #6182757)
KLEIN DUB & HOLLEB, LTD.
660 LaSalle Place, Suite 100
Highland Park, Illinois 60035
(847) 681-9100
dhirsch@labor-law.com